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*Attorneys for Defendants*  
*United HealthCare Insurance Company and United HealthCare Services*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

FREMONT EMERGENCY SERVICES  
(SCHERR), LTD,

Plaintiff,

v.

UNITED HEALTHCARE INSURANCE  
COMPANY AND UNITED HEALTHCARE  
SERVICES,

Defendants.

CASE NO. 2:22-cv-01118

**STIPULATION AND [PROPOSED]  
ORDER FOR EXTENSION OF TIME  
TO RESPOND TO THE COMPLAINT**

**(FIRST REQUEST)**

WHEREAS, Plaintiff Fremont Emergency Services (Scherr), Ltd ("Fremont") commenced the above-captioned action (the "Action") on July 13, 2022, against Defendants United Healthcare Insurance Company and United Healthcare Services ("United");

WHEREAS, United was served with the Complaint on July 19, 2022;

1 WHEREAS, United must file and serve an answer or a motion under Rule 12 by August 9,  
2 2022;

3 WHEREAS, Fremont has agreed to extend the response deadline by 30 days, until  
4 September 8, 2022, so that United has sufficient time to respond to the allegations in the Complaint;

5 WHEREAS, this is the first stipulation for extension of time for United to respond to the  
6 Complaint;

7 IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, by and  
8 among the undersigned counsel, that United's deadline to respond to the Complaint is extended  
9 until September 8, 2022.

10 DATED this 5th day of August, 2022.


11 PISANELLI BICE PLLC

12  
13 By: /s/ Debra L. Spinelli  
14 James J. Pisanelli, Esq., Bar No, 4027  
15 Debra L. Spinelli, Esq., Bar No. 9695  
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14 **ORDER**

15 **IT IS SO ORDERED**

15 **DATED:** 5:23 pm, August 09, 2022

16   
17 **BRENDA WEKSLER**  
18 **UNITED STATES MAGISTRATE JUDGE**

16 Jeffrey S. Gleason (*pro hac vice* forthcoming)  
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